TRANSPARENCY RECORD

Christchurch City Council Formal Admission

Absence of Comparative Infrastructure vs Managed Retreat Analysis

LGOIMA Reference: 1699858 | Response dated August 2026

1. Purpose of this Record

This document records a formal response from Christchurch City Council under the Local Government Official Information and Meetings Act 1987 (LGOIMA). It forms part of an ongoing independent public-interest documentation of a consistent national pattern: the absence of comparative analysis between major flood/coastal infrastructure investment options and managed retreat or property acquisition pathways, and the absence of modelling of long-term ratepayer and revenue impacts.

This record is intended to sit alongside two earlier independent documents:

- **National Pattern and Drivers Analysis (July 2026)** – multi-council documentation of the shift from detailed engineering baselines to high-level adaptation documents and the default to evacuation/retreat messaging.
- **National Pattern Update – Te Waihanga Admission (July 2026)** – formal confirmation from the New Zealand Infrastructure Commission (Te Waihanga) that it holds no comparative analysis of infrastructure investment versus managed retreat and no modelling of Crown or ratepayer liabilities from retreat pathways.

2. The Request Made to Christchurch City Council

On 30 June 2026 the following information was requested:

1. Total expenditure by Christchurch City Council on external consultants, advisors or contractors for work related to flood protection, stormwater, coastal hazard assessment, managed retreat, property acquisition or climate adaptation planning from 1 July 2020 to the present, with breakdown by financial year and major project where possible.
2. Any reports, briefings, technical assessments or analysis prepared since 2020 that compare or assess the costs, benefits, risks or long-term outcomes of major infrastructure protection options (drainage upgrades, pumping stations, stopbanks, land raising) versus managed retreat, property acquisition or voluntary buyout pathways in Christchurch.
3. Any modelling or advice on the long-term impacts on ratepayers, property values or council revenue from large-scale property acquisition or managed retreat in the city.

3. The Council's Formal Response – Key Admission

Parts 2 and 3 of the request were declined under section 17(e) of the LGOIMA on the explicit ground that the information does not exist or cannot be found.

The Council stated:

> *"We can confirm that there have been no reports, briefings, technical assessments, or analysis that compare major infrastructure protection options (drainage/pumping stations/stopbanks etc) vs managed retreat/property acquisition/or voluntary buyouts or modelling or advice on the long-term impacts on ratepayers, property values, or council revenue from large-scale property acquisition or managed retreat in the city. Due to this, we will be*

> *declining these parts of the request under section 17(e) of the LGOIMA, the information does not exist or cannot be found."*

This is a clear, dated, written admission by a major territorial authority that the comparative analysis and the ratepayer-impact modelling do not exist in the form requested.

4. Expenditure Figures Released

The Council released limited financial information restricted to the Climate Hazards Adaptation Planning team (formed 2022). Work prior to 2022 and work coded under other teams (Three Waters/stormwater, Property, Planning, flood protection) was excluded.

Category	2022	2023	2024	2025	2026	Total
Managed Retreat	0	0	0	0	0	0
Coastal Hazards (science)	117,302	26,933	74,697	116,985	67,619	403,536
Climate Change Adaptation	163,837	355,230	236,422	584,185	1,088,845	2,428,518
TOTAL	**281,139**	**382,163**	**311,119**	**701,169**	**1,156,464**	**2,832,054**

Note: The Council explicitly stated that these figures do not include stormwater, property acquisition or flood protection activities conducted under other projects and business-as-usual workstreams. Actual related expenditure is therefore higher and more fragmented than the table shows.

5. National Context – Why This Admission Matters

This Christchurch response is consistent with the national pattern already documented:

- **Te Waihanga (New Zealand Infrastructure Commission)** formally confirmed it holds no comparative analysis of major infrastructure investment versus managed retreat pathways and no modelling of long-term Crown or ratepayer liabilities associated with retreat (OIA26-TW16).
- **Multiple councils** (including those in South Dunedin, Tauranga, Hawke's Bay, Thames-Coromandel, Hamilton, Northland, Eastern Auckland and Nelson-Tasman) have either declined similar requests on the basis that the comparative work does not exist, or have defaulted to high-level adaptation documents that do not contain the detailed cost-benefit or residual-risk analysis previously present in older engineering and ICMP records.
- **Public communications** during weather events frequently prioritise evacuation and retreat preparation messaging while providing limited contemporaneous transparency on the condition, capacity and maintenance status of existing flood-protection assets.

The Christchurch admission adds a major South Island territorial authority to the list of agencies that have now formally stated, in writing, that the comparative infrastructure-versus-retreat analysis and the associated ratepayer-impact modelling are not held.

6. What This Record Establishes (and Does Not)

It establishes:

- A dated, formal written statement by Christchurch City Council that the requested comparative analysis and ratepayer-impact modelling do not exist or cannot be found.
- Partial visibility of consultant and internal expenditure under one specific team, with clear caveats that the true spend is higher and dispersed.

- Consistency with the pattern already recorded from Te Waihanga and other councils.

It does not establish:

- That managed retreat is never appropriate, or that infrastructure investment is always superior.
- The motives of any individual or agency.
- That the information must exist somewhere else and is being deliberately withheld (the Council has stated it does not exist).

7. Public Interest

Decisions that shift communities toward managed retreat or large-scale property acquisition carry long-term fiscal, social and property-rights consequences. Ratepayers and property owners are entitled to know whether those decisions rest on comparative analysis of infrastructure alternatives and on modelling of residual costs and revenue impacts. Where that analysis and modelling are formally stated not to exist, the gap itself is a matter of public interest.

This record is published so that the Christchurch City Council statement sits on the public record alongside the earlier national pattern documentation and the Te Waihanga admission.

8. Source Document

Christchurch City Council, Official Information response, LGOIMA reference 1699858, “Consultant expenditure and infrastructure vs managed retreat analysis (2020–2026)”, August 2026. Response signed by Jess Griffin, Official Information Advisor, Legal & Democratic Services.

Related independent records: National Pattern and Drivers Analysis (July 2026); National Pattern Update – Te Waihanga Admission (July 2026).

— End of Record —

Independent researcher | Public interest documentation | August 2026